

**UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF NEW YORK**

---

Joshua Lebaron, individually and  
on behalf of all other similarly situated  
individuals,

Case No. 6:14-cv-06628-FPG-MWP

Plaintiff,

v.

**NOTICE OF CONSENT FILING**

Kayden Industries (USA), Inc.,

Defendant.

---

PLEASE BE ON NOTICE, that pursuant to 29 U.S.C. § 216, Plaintiff hereby files the  
attached Consent Form(s) for the following person(s):

Green, Derek

DATE: March 17, 2015

s/Alexander M. Baggio  
NICHOLS KASTER, PLLP  
Alexander M. Baggio, MN Bar No. 389912  
Timothy C. Selander, MN Bar No. 0387016  
Michele R. Fisher, NY Bar No. MF4600  
4600 IDS Center  
80 South 8th Street  
Minneapolis, MN 55402  
Telephone: (612) 256-3200  
abaggio@nka.com  
selander@nka.com  
fisher@nka.com

Attorneys For Plaintiff and the Putative  
FLSA Collective Class


---

**KAYDEN INDUSTRIES (USA), INC.  
PLAINTIFF CONSENT FORM**

---

1. I consent to make a claim under the Fair Labor Standards Act, 29 U.S.C. § 201, et seq. against my current/former employer, Kayden Industries (USA), Inc. to recover overtime pay.
2. During the past three years, there were occasions when I worked over 40 hours per week as a solids control technician, or other similar position, for Kayden Industries (USA), Inc., and did not receive proper compensation for all of my hours worked, including overtime pay.
3. If this case does not proceed collectively, then I also consent to join any subsequent action to assert these claims against Kayden Industries (USA), Inc.
4. I understand that I may withdraw my consent to proceed with my claims at any time by notifying the attorneys handling the matter.

Date: 3/16/15

  
Signature

Derek Green  
Print Name

Redacted

**CERTIFICATE OF SERVICE**

I hereby certify that on March 17, 2015, I electronically filed the foregoing document with the clerk of Court using the electronic case filing system. All counsel of record have been served via the Court's ECF system.

Arthur F. Silbergeld,  
NORTON ROSE FULBRIGHT LLP  
555 S. Flower Street, Forty-First Floor  
Los Angeles, CA 90071  
Telephone: (213) 892-9235  
Facsimile: (213) 892-9494  
Email: [Arthur.silbergeld@nortonrosefulbright.com](mailto:Arthur.silbergeld@nortonrosefulbright.com)

Shafeeqa W. Giarratani  
NORTON ROSE FULBRIGHT LLP  
98 San Jacinto, Suite 1100  
Austin, TX 78701  
Telephone: (512) 474-5201  
Facsimile: (512) 536-4598  
Email: [shafeeqa.giarratani@nortonrosefulbright.com](mailto:shafeeqa.giarratani@nortonrosefulbright.com)

Sharon P. Stiller  
Abrams, Fensterman, Fensterman, Eisman,  
Formato, Ferrara & Wolf, LLP  
160 Linden Oaks, Suite E  
Rochester, NY 14625  
Telephone: (585-218-9999)  
Facsimile: (585) 218-0562  
Email: [ssiller@abramslaw.com](mailto:ssiller@abramslaw.com)

Attorneys for Defendant

s/Alexander M. Baggio  
Alexander M. Baggio